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Kris Monteith
Acting Bureau Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Reply to the Coalition of E-Reader Manufacturers' Petition for Waiver from CVAA Accessibility Requirements, CG Docket No. 10-213

Dear Mr. Monteith:

My name is Karl Smith and I am the owner of Axis, a company which provides all types of hardware and software access technology for people who are blind or have low vision. I have been in the access technology field for more than 35 years both as a provider and end user of many different access technology products as I am totally blind myself.

Ever since I was very young I have had a love of books and reading. As a child and young adult with low vision I used both standard and electronic magnification as well as listening to recordings and reading books in Braille. In short, I used any method available to me to get the information I wanted.

Since becoming totally blind over 20 years ago and with the advent of talking computers I read books and other materials in electronic format. In some cases printed items are provided in an accessible format but more often than not I use a scanner and Optical Character Recognition software to access them.

In recent years I have watched with great anticipation the introduction of electronic books and e-book readers such as the Kindle knowing that digital text can easily be made accessible via speech or Braille. In fact the Kindle Fire my Son owns has speech output available on some books already depending on whether the publisher allows it to be activated. The Kindle readers are very close to being accessible as they are requiring only relatively minor software modifications to make the menus and other control setting screens speak. I strongly oppose the Petition for Waiver submitted by the Coalition of E-Reader Manufacturers', requesting that e-readers be exempt from the Twenty First Century Communications and Video Accessibility Act (CVAA).

The Coalition claims that the primary purpose of e-readers is reading, not ACS. This is simply not the case as the ability to connect with friends, share content, and access the internet are the very features that set e-readers apart from print books. I often see my Son and other friends post reviews of books they have read on their Kindles directly to Facebook from the device. ACS facilitates the reading experience and is, therefore, a co-primary purpose of e-readers.

Each year hundreds of thousands of books, magazines and other materials are produced in print and now electronic format. Even though programs exist to produce recorded and Braille versions of print material only a tiny percent of what is available ever gets converted to accessible format. This is particularly true for specialized material such as technical journals, textbooks and other items intended for those in highly specialized fields. Many millions of these materials are available through e-readers.

Much is made of the so-called digital divide between the poor and others in the country. Yet even though the Department of Justice and the Department of Education prohibit K-12 school districts and institutions of higher education from using inaccessible e-readers, the Coalition continues knowingly to sell inaccessible equipment to schools making the digital divide a serious detriment to the education of blind and low vision students. The CVAA is consistent with preexisting legal requirements, and the FCC should not give the Coalition incentive to continue resisting accessibility.

I strongly urge the FCC to reject the Coalition's petition and uphold the spirit of the CVAA. E-readers and the ACS features found in that equipment must be made accessible and granting a waiver would perpetuate the digital divide and discrimination in the marketplace that I face every day.

Sincerely,

A handwritten signature in black ink that reads "Karl Smith". The signature is written in a cursive, flowing style.

Karl Smith